

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

JUL 12 2018

UNITED STATES OF AMERICA §  
§  
v. § No. 1:18-CR-00007  
§ BY DEPUTY \_\_\_\_\_  
§  
JOEL VARGAS (3) §  
ALFONSO ESCOBAR SOSA (4) §  
ANGELICA MARIA VARGAS (5) §  
DANIELLE MARIE YBARRA (6) §  
CARLOS GODINEZ (7) §

1:18cr7  
Judge Crone

**FIRST SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. § 2314  
(Interstate Transportation of  
Stolen Property)

On or about January 18, 2018, in the Eastern District of Texas and elsewhere,  
**Danielle Marie Ybarra**, defendant, and others both known and unknown to the Grand  
Jury, did cause to be transported and transferred in interstate commerce from the State of  
Louisiana to the State of Texas, goods, wares, and merchandise of a value of \$5,000 or  
more, knowing the same to have been stolen, converted, or taken by fraud, to wit,  
approximately \$39,742.76 in Goodyear tires.

All in violation of 18 U.S.C. §§ 2314 and 2.

**Count Two**

Violation: 18 U.S.C. § 2314  
(Interstate Transportation of  
Stolen Property)

On or about December 17, 2017, **Joel Vargas** and **Alfonso Escobar Sosa**, defendants, and others both known and unknown to the Grand Jury, did cause to be transported and transferred in interstate commerce from the State of Texas to Mexico, goods, wares, and merchandise of a value of \$5,000 or more, knowing the same to have been stolen, converted, or taken by fraud, to wit, approximately \$38,094 in tires stolen from Goodyear Commercial Tire & Service Center in Beaumont, Texas.

All in violation of 18 U.S.C. §§ 2314 and 2.

**Count Three**

Violation: 18 U.S.C. § 2314  
(Interstate Transportation of  
Stolen Property)

On or about December 22, 2017, **Joel Vargas** and **Alfonso Escobar Sosa**, defendants, and others both known and unknown to the Grand Jury, did cause to be transported and transferred in interstate commerce from the State of Texas to Mexico, goods, wares, and merchandise of a value of \$5,000 or more, knowing the same to have been stolen, converted, or taken by fraud, to wit, approximately \$33,100 in tires stolen from Goodyear Commercial Tire & Service Center in Longview, Texas.

All in violation of 18 U.S.C. §§ 2314 and 2.

**Count Four**

Violation: 18 U.S.C. § 371  
(Conspiracy)

From on or about January, 2008, the exact date being unknown, until on or about January 18, 2018 in the Eastern District of Texas and elsewhere, **Joel Vargas, Alfonso Escobar Sosa, Angelica Maria Vargas, Danielle Marie Ybarra, and Carlos Godinez**, Defendants herein, did knowingly, willfully, and unlawfully conspire, combine, confederate, and agree with each other and others known and unknown to the Grand Jury, to transport stolen tires in interstate commerce, in violation of 18 U.S.C. §§ 2314 and 2.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the Defendants and co-conspirators performed the following overt acts in the Eastern District of Texas, among others:

- a. On or about January 18, 2018, **Danielle Marie Ybarra**, defendant herein, in concert with Arthur Vargas, Jr., and Barkhi Ben Holley, transported approximately 104 stolen tires from the State of Louisiana to the State of Texas, and were arrested in Beaumont, Texas.
- b. On or about December 17, 2017, **Joel Vargas** and **Alfonso Escobar Sosa**, defendants herein, burglarized Goodyear Commercial Tires & Service in Beaumont, Texas.
- c. On or about December 22, 2017, **Joel Vargas** and **Alfonso Escobar Sosa**, defendants herein, burglarized Goodyear Commercial Tires & Service in Longview, Texas.

All in violation of 18 U.S.C. § 371.

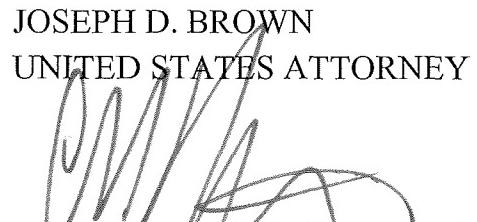
A TRUE BILL



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GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY



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CHRISTOPHER TORTORICE  
ASSISTANT U. S. ATTORNEY

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**NOTICE OF PENALTY**

**Counts One through Three**

Violation: 18 U.S.C. § 2314 (Interstate Transportation of Stolen Property)

Penalty: Not more than ten (10) years imprisonment; a fine of not more than \$250,000 (or twice the pecuniary gain to the defendant or loss to the victim), or both. A term of supervised release of not more than three (3) years.

Special Assessment: \$100.00

**Count Four**

Violation: 18 U.S.C. § 371 (Conspiracy)

Penalty: Not more than five (5) years imprisonment; a fine of not more than \$250,000 (or twice the pecuniary gain to the defendant or loss to the victim), or both. A term of supervised release of not more than three (3) years.

Special Assessment: \$100.00